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JERRY NEHL BOYLAN

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JERRY NEHL BOYLAN,

Defendant.

Case No. 2:22-cr-00482-GW

**UNOPPOSED *EX PARTE*
APPLICATION FOR AN
EXTENSION OF TIME TO SUBMIT
DEFENDANT'S REPLY TO
GOVERNMENT'S RESTITUTION
BRIEF**

1 Defendant Jerry Nehl Boylan, through counsel, applies *ex parte* for an extension
2 of time to file his response to the government's restitution brief on July 8, 2024. The
3 restitution positions are currently due July 2, 2024. The government does not oppose
4 this application. This application is based on the attached declaration and all other files
5 and records in this case.

6 Respectfully submitted,
7
8 CUAUHTEMOC ORTEGA
9 Federal Public Defender

10 DATED: July 2, 2024

By /s/ Gabriela Rivera

11 GABRIELA RIVERA
12 JULIA DEIXLER
13 Deputy Federal Public Defenders
14 Attorney for JERRY NEHL BOYLAN
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DECLARATION OF GABRIELA RIVERA

1. I am a Deputy Federal Public Defender assigned to represent Jerry Boylan.

2. On May 2, 2024, this Court sentenced Mr. Boylan to 48 months in prison. (Dkt. 443.) The government requested a restitution hearing, and Mr. Boylan requested a period of time to self-surrender. The Court set the restitution hearing for July 11, 2024, and ordered restitution positions to be filed by July 2, 2024. (*Id.*)

3. In advance of the deadline for the parties' separate filings regarding restitution, the government provided me with two separate productions of documents and records the government received from the next of kin.

4. In advance of the deadline for the parties' separate filings, I reached out to government counsel in an effort to understand the nature and extent of the government's anticipated restitution request. Specifically, I requested that government counsel advise whether they intended to seek restitution for all of the expenses they had provided documentation for. Government counsel responded that the government's forthcoming brief will inform the Court about the restitution requests and supporting documentation received from the next of kin and will also provide the Court with the relevant law while acknowledging that some restitution requests may not be legally cognizable.

5. In light of the government's response, it is clear that I will need to review the government's brief in order to understand the government's position on restitution before I can provide the Court with Mr. Boylan's complete position on restitution. Accordingly, I am requesting additional time to review the government's brief and respond to it.

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